

Remarks

Favorable reconsideration of this application is requested in view of the following remarks. For the reasons set forth below, Applicant respectfully submits that the claimed invention is allowable over the cited references.

The non-final Office Action dated May 4, 2004, indicated that claims 1 and 3-8 are rejected under 35 U.S.C. § 102(e) over *Chung et al.* (U.S. Patent No. 5,931,936) and claims 2 and 9 are rejected under 35 U.S.C. § 103(a) over *Chung et al.* in view of *Nguyen* (U.S. Pub. No. US20030028697).

Applicant has amended the claims to remove reference numerals and improve the readability of the claims and not for any reasons related to patentability.

Applicant respectfully traverses the Section 102(b) and Section 103(a) rejections because the Office Action fails to present a reference that corresponds to the claimed invention. The Office Action fails to identify where the cited '936 reference teaches a first in first out (FIFO) buffer, as claimed in each of the independent claims. A brief review and word search of the '936 reference revealed no teachings of a FIFO buffer. In opposition to the claimed FIFO, as indicated in Figure 1, the '396 queue controller, interrupt queue controller, and interrupt queue output controller in combination determine priority and operate accordingly. Without a showing of correspondence to each of the claimed limitations, the Section 102(b) rejection is improper and cannot be maintained. Applicant accordingly requests that the rejections be withdrawn.

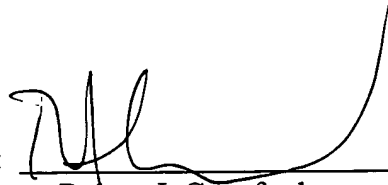
Moreover, with respect to the Section 103(a) rejection, the Office Action fails to present the requisite evidence of motivation that a skilled artisan would combine the cited references as suggested by the Office Action. The Office Action's proposal to introduce the virtual interrupt of *Nguyen* into the '936 system would completely replace and, therefore, undermine and destroy the purpose of the '936 system. *See* '936 reference col. 1, line 51- col. 2, line 11. Without a presentation of evidence for combining the cited references, the Section 103(a) rejection is improper and Applicant requests that the rejection be withdrawn.

In view of the remarks above, Applicant believes that each of the rejections has been overcome and the application is in condition for allowance.

Should there be any remaining issues that could be readily addressed over the telephone, the Examiner is asked to contact the agent overseeing the application file, Mr. Peter Zawilski, of Philips Corporation at (408) 474-9063.

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